

DALE R. BISH, State Bar No. 235390  
MIKAELA K. BURKHARDT, State Bar No. 328112  
WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
650 Page Mill Road  
Palo Alto, CA 94304-1050  
Telephone: (650) 493-9300  
Email: dbish@wsgr.com  
mburkhardt@wsgr.com

Attorneys for Defendant  
Reddit, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

LEVELFIELDS, INC., individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

REDDIT, INC., a California Corporation,

Defendants.

) Case No.: 3:24-cv-02760-WHO

) **DECLARATION OF MIKAELA**  
) **BURKHARDT IN SUPPORT OF**  
) **DEFENDANT REDDIT, INC.'S**  
) **MOTION TO DISMISS COMPLAINT**

) Date: August 28, 2024

) Time: 2:00 p.m.

) Before: Hon. William H. Orrick

1 I, Mikaela Burkhardt, declare:

2 1. I am an associate with the law firm of Wilson Sonsini Goodrich & Rosati,  
3 attorneys of record for Defendant Reddit, Inc. (“Reddit”). I have personal knowledge of the facts  
4 described below, and if called as a witness, could and would testify competently thereto.

5 2. Attached hereto as Exhibit A is a true and correct copy of the Standard Terms and  
6 Conditions For Internet Advertising For Media Buys One Year Or Less, Version 3.0 (the “IAB  
7 3.0 Terms”), available at [https://www.iab.com/wp-content/uploads/2015/06/IAB\\_4As-tsandcs-](https://www.iab.com/wp-content/uploads/2015/06/IAB_4As-tsandcs-FINAL.pdf)  
8 FINAL.pdf, which I visited on or around June 10, 2024.

9 3. Attached hereto as Exhibit B is a true and correct copy of the Reddit, Inc. Terms  
10 & Conditions: Ads Platform, effective January 19, 2018 (the “Ads Platform” contract), available  
11 at [https://business.reddithelp.com/helpcenter/s/article/REDDIT-ADVERTISING-PLATFORM-](https://business.reddithelp.com/helpcenter/s/article/REDDIT-ADVERTISING-PLATFORM-TERMS)  
12 TERMS, which I visited on or around June 10, 2024.

13 4. On June 11, 2024, I visited what I believe to be Plaintiff’s website, i.e.,  
14 <https://www.levelfields.ai>. The “about” page describes Plaintiff Levelfields Inc. as “a team of  
15 software engineers, linguists, data scientists and entrepreneurs who see the world not as it is, but  
16 as it could be.” A true and correct copy of that page is attached hereto as Exhibit C.

17 I declare under penalty of perjury under the laws of the United States that the foregoing is  
18 true and correct. Executed this 18th day of June 2024 at Palo Alto, California

19  
20 By: /s/ Mikaela Burkhardt  
21 Mikaela Burkhardt  
22  
23  
24  
25  
26  
27  
28

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Dale Bish, am the ECF User whose identification and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have concurred in this filing.

Dated: June 18, 2024

/s/ Dale Bish  
Dale Bish